

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re Karen Johnson-Kamwanga,)	
)	Chapter 13
Debtor)	Hon. G. Michael Halfenger
)	Case No. 14-34211-gmh

NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

Karen Johnson-Kamwanga has filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk of Bankruptcy Court
517 E. Wisconsin Avenue, Room 126
Milwaukee, WI 53202-4581

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Ryan Blay
Lakelaw

6905 Green Bay Road, Suite 101
Kenosha, WI 53142

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is:
 ___X___ the Debtor;
 _____ the Chapter 13 Trustee (post-confirmation modifications only);
 _____ the holder of an unsecured claim (_____) (post-confirmation modifications only)
2. This is a request to modify a Chapter 13 Plan (Select A or B):
 - A. _____ post-confirmation
 - B. ___X___ pre-confirmation (select i. or ii.);
 - i. _____ Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
 - ii. ___X___ Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are: See attached creditor service list
3. The Proponents wish to modify the Chapter 13 Plan to do the following:
 - (a) Amend Section 6(A)(i) to provide for adequate protection payments of \$712.38 to Chrysler Capital for the 2013 Dodge Journey;
 - (b) Amend Section 6(C) to reflect a surrender of the 2010 Hyundai Elantra to Hyundai Motor Finance.
4. The reasons for the modifications are to provide proper adequate protection to a secured creditor with a lien on personal property and to note the treatment of secured debt for the second vehicle.

5. Select A. or B.

A. _____ The Chapter 13 Plan confirmed on _____ is modified as follows:

B. X The unconfirmed Chapter 13 plan dated and filed on November 24, 2014 _____ is modified as follows: See Section 3

All remaining items and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. **BY SIGNING BELOW, THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Dated January 7, 2015 at Kenosha, Wisconsin

LAKELAW

By: : _____/s/ Ryan Blay_____

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re Karen Johnson-Kamwanga,

Debtor

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Chapter 13
Hon. G. Michael Halfenger
Case No. 14-34211-gmh

CERTIFICATE OF SERVICE

The undersigned, an attorney, swears that he did serve a true and accurate copy of the Debtor's Motion to Modify Plan on the date below as follows:

By CM/ECF Electronic Service to the Office of the U.S. Trustee, the Office of the Chapter 13 Trustee Mary B. Grossman, and to attorney Jay J. Pitner, on behalf of Wells Fargo Bank, N.A.

By United States Mail, First Class, postage pre-paid from Kenosha, WI to

Karen Johnson-Kamwanga
5000 N. 65th St.
Milwaukee, WI 53218

Hyundai Motor Finance
PO Box 20809
Fountain Valley, CA 92728

Hyundai Motor Finance
PO Box 20829
Fountain Valley, CA 92728

Chrysler Capital
P.O. Box 961279
Fort Worth, TX 76161

/s/ Ryan Blay
January 7, 2015